



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

November 7, 2007

Forrest Cole
Forest Supervisor
Tongass National Forest
Federal Building
648 Mission Street
Ketchikan, Alaska 99901

RE: Iyouktug Timber Sale, Draft Environmental Impact Statement

Dear Mr. Cole:

The National Marine Fisheries Service (NMFS) has reviewed the Iyouktug Timber Sale Draft Environmental Impact Statement (DEIS) and Essential Fish Habitat (EFH) assessment. The project is located in the northeastern part of Chichagof Island in the Iyoktug valley, northwest of the Iyoukeen Peninsula, approximately 12 miles east-southeast of Hoonah, Alaska.

The proposed action for the Iyoktug Timber Sale would harvest 4,185 acres of Forest Service (FS) land. The other four action alternatives would harvest in a range between 883 and 3,332 acres. The EFH assessment describes potential impacts to EFH in fresh and marine waters. Of a total of 330 miles of streams in five watersheds, 74 miles are Class I streams. Iyouktug, Suntaheen and Whitestone Head creeks and tributaries support populations of pink, chum and coho salmon. Iyouktug and Suntaheen creeks also have populations of Dolly Varden char, cutthroat trout and steelhead. Whitestone Creek also has Dolly Varden char.

Potential adverse effects to freshwater EFH include changes in water yield, sediment, water temperature, and fish passage at road crossings. You have determined that effects on water yield will be negligible because for all alternatives 10 percent or less of the canopy will be removed per watershed and 15 percent or less will be removed per sub-watershed. This is based on studies you have referenced, without citation, that show increases in water yield when a threshold of over 20 percent of the canopy is removed. We recommend that the final EIS include a citation for these studies.

Water temperature increases may occur in streams when shade producing trees are removed. Approximately 1.3 percent to 3.9 percent of Class IV streams, less than 5 feet wide and generally far upstream of EFH will be harvested without buffers. Temperature increases are not expected in any of the watersheds.

Three to six new roads will cross anadromous streams and three to 20 new roads will cross streams above fish habitat. These stream crossing could increase sedimentation to fish streams.



To address the potential adverse effects of this project to freshwater EFH, the FS has proposed that the following measures be taken.

- Stream buffers are prescribed along all Class I, II and III streams according to Forest Plan standards and guidelines. Class I and II streams will receive a minimum no-cut buffer of 100 feet and Class III streams will receive a slope break buffer.
- In areas where extensive windthrow has occurred or is expected, buffer widths will be increased to help ensure resistance to windthrow.
- Best Management Practices (BMPs) will be implemented to protect water quality and aquatic habitat for all freshwater streams. The unit cards contain specific applications of BMPs.
- Bridges will be placed at all road crossings over fish streams to minimize risks of sediment production and blockage of fish passage. All but three structures will be removed after the timber harvest.
- Temporary roads will be decommissioned following use for this timber sale and culverts will be removed.

Potential adverse effects to marine EFH would be associated with use of the East Port Frederick marine access facility or “MAF”. The MAF has been in use since 1983 and was listed by the State of Alaska under the Clean Water Act Section 303(d) for non-attainment of the residues standard for bark and woody debris. Dive survey information has documented an exceedance for the threshold bark accumulation, which was last documented in 2006 at 2.9 acres of continuous bark coverage. The MAF is the subject of a remediation plan submitted by Huna Totem Corporation to the Department of Environmental Conservation that is designed to reduce continuous bark coverage to less than 1.5 acres within a reasonable period of time.

The marine waters of East Port Frederick are identified as EFH for a number of federally managed species, and species of concern to EFH, including the following: arrowtooth flounder, Atka mackerel, capelin, Chinook salmon, pink salmon, sockeye salmon, chum salmon, coho salmon, eulachon, Greenland turbot, octopus, Pacific cod, Pacific ocean perch, rex sole, rock sole, flathead sole, Dover sole, yellowfin sole, sablefish, sand lance, sculpin, shark, shortraker, rougheye and yelloweye rockfish, skate, squid, walleye pollock and weathervane scallops.

The potential adverse effects of the use of the MAF for log transfer by this project to marine EFH include diminished habitat value for managed species and their prey due to additional bark accumulation that smothers subtidal habitat. The FS has proposed the following measures to minimize negative effects to marine EFH.

- The FS will abide by all stipulations in Huna Totem’s permits for operating the MAF.
- The FS actions will be in compliance with Huna Totem’s approved remediation plan.

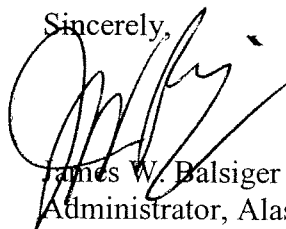
- Optional loading of logs onto barges will help prevent further bark accumulation on the subtidal substrate.

Section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA) requires federal agencies to consult with NMFS on all actions that may adversely affect EFH. NMFS is required to make conservation recommendations, which may include measures to avoid, minimize, mitigate or otherwise offset adverse effects. As you have acknowledged in your EFH assessment, the Iyouktug Timber Sale would adversely affect both freshwater and marine EFH. You have incorporated measures into the project that would reduce these effects by abiding to all stipulations in Huna Totem's permits for the MAF, and complying with the approved remediation plan. You have indicated that optional barging of logs would further prevent bark accumulation on the subtidal substrate. NMFS recommends that given the degraded nature of the MAF site, mandatory barging of logs should be required to minimize the deposition of bark at the MAF. Mandatory barging is justified because it is an available technology, the site has exceeded the maximum depositional area for bark and is the subject of a remediation plan, and the FS should not counter efforts to remediate the site by knowingly allowing the use of log rafting when a better measure is available and feasible. Consequently, NMFS offers the following EFH Conservation Recommendation pursuant to Section 305(b)(4)(A) of the MSFCMA.

Only barging of logs should be allowed at the East Port Frederick MAF. No rafting should be allowed to minimize the re-deposition of bark that would counter efforts of the remediation plan.

Upon receipt of these EFH Conservation Recommendations, the MSFCMA requires Federal Agencies to respond to NMFS within 30 days informing us of the agency's decision regarding these recommendations.

Thank you for the opportunity to comment. If you have questions regarding our comments contact Linda Shaw at (907) 586-7585.

Sincerely,

James W. Balsiger
Administrator, Alaska Region

cc: *Chris Meade, EPA Juneau
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